

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

'98 FEB 6 AM 11 47

IN RE: BELLSOUTH TELECOMMUNICATIONS,)
INC.'S ENTRY INTO LONG DISTANCE) Docket No.
(INTERLATA) SERVICE IN TENNESSEE) 97-00309
PURSUANT TO SECTION 217 OF THE)
TELECOMMUNICATIONS ACT OF 1996)

Comments of NEXTLINK

NEXTLINK Tennessee LLC (NEXTLINK) submits the following suggestions concerning the two technical conferences scheduled in the above-captioned proceeding. NEXTLINK is authorized to state that ACSI joins in these comments.

a. Because of the large number of parties and observers, the TRA should consider holding the workshop at a suitable location other than the TRA offices.

b. All parties wishing to participate should be directed to bring technical experts with experience in the areas to be discussed. Parties should avoid, to the extent possible, a "we'll get back to you" response. BellSouth, in particular, should bring experts responsible for the following OSS operations:

1. Pre-Ordering
2. Maintenance and Repair
3. Ordering and Provisioning
4. Billing

c. To insure that the proper experts are available, the staff should request a list of issues from the parties in advance of the OSS workshop on March 5 & 6, and the Performance Measurements workshop on March 23-24.

d. The workshop should be moderated by the TRA technical staff. Experts should talk directly to other experts in an informal manner, instead of presenting demonstrations for cross-examination by attorneys.

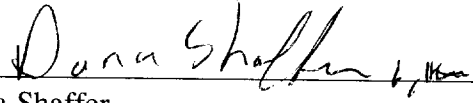
e. At the OSS workshop, the TRA should focus on whether the operational support system Bell makes available to CLECs is as good as Bell's internal system. This would require a presentation of how each system works.

The Florida Commission held a six-hour, open workshop on OSS in which experts from various competing carriers and the Florida Staff talked to and asked questions of Bell's OSS experts. This took place with minimal interference by attorneys. This format enabled everyone to gain a relatively in-depth understanding of the capabilities inherent in Bell's systems. This is a much better approach than listening to canned demonstration speeches.

Similarly, the Georgia OSS workshop was designed to provide a forum for the staff to learn of OSS-related problems encountered by CLECs and an opportunity for the staff to learn what solutions are needed and proposed by various CLECs. At no time during the Georgia workshop did anyone actually demonstrate an OSS system. Rather, the companies were asked to file lists of issues ahead of time. The Georgia staff then prepared an issues list which became the focus of a round-table style discussion.

NEXTLINK recommends that the TRA Staff conduct the technical workshop in the manner described herein.

Respectfully submitted,

A handwritten signature in cursive script, reading "Dana Shaffer", is written over a horizontal line.

Dana Shaffer
NEXTLINK Tennessee
105 Molloy Street, Suite 300
Nashville, TN 37201

CERTIFICATE OF SERVICE

I hereby certify that on 2/6/98, a copy of the foregoing document was served on the parties of record, via hand-delivery, overnight delivery or U.S. Mail, postage prepaid, addressed as follows:

Dana Shaffer, Esq.
NEXTLINK
105 Molloy Street, #300
Nashville, TN 37201

L. Vincent Williams, Esq.
Consumer Advocate Division
426 5th Avenue, N., 2nd Floor
Nashville, TN 37243

H. LaDon Baltimore, Esq.
Farrar & Bates
211 Seventh Ave. No., #320
Nashville, TN 37219-1823

Thomas E. Allen
Intermedia Communications
3625 Queen Palm Drive
Tampa, FL 33619

Charles B. Welch, Esq.
Farris, Mathews, et al.
511 Union Street, #2400
Nashville, TN 37219

Carolyn Tatum Roddy, Esq.
Sprint Communications
3100 Cumberland Circle, N0802
Atlanta, GA 30339

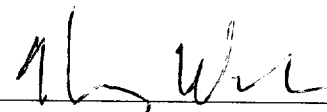
Jon E. Hastings, Esq.
Boult, Cummings, et al.
P.O. Box 198062
Nashville, TN 37219-8062

Guilford Thornton, Esq.
Stokes & Bartholomew
424 Church Street
Nashville, TN 37219

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce Street, #2101
Nashville, TN 37201-3300

D. Billye Sanders, Esq.
Waller, Lansden, Dortch & Davis
511 Union Street, #2100
Nashville, TN 37219-1750

Val Sanford, Esq.
Gullett, Sanford, et al.
230 Fourth Ave. N., 3d Floor
Nashville, TN 37219-8888



Henry Walker